

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

NEW HAMPSHIRE INDONESIAN
COMMUNITY SUPPORT, *et al.*,

Plaintiffs,
v.

DONALD J. TRUMP, *et al.*,

Defendants.

Case No. 1:25-cv-00038-JL-TSM

**MOTION FOR ADMISSION, *PRO HAC VICE*, OF
GABRIEL R. CANAAN AS COUNSEL FOR *AMICUS*
IMMIGRATION REFORM LAW INSTITUTE**

1. In accordance with Local Rule 83.2(b), *amicus* the Immigration Reform Law Institute (“IRLI”) respectfully moves this court for an order admitting Gabriel R. Canaan to the bar of this Court, *pro hac vice*, for the purpose of representing *amicus* IRLI in the above-referenced case. Mr. Canaan is knowledgeable regarding the meaning of the Citizenship Clause in the Fourteenth Amendment and is familiar with the issues raised in this case, and it would be beneficial to permit Mr. Canaan to appear before the Court in this matter.

2. Mr. Canaan is a member in good standing of the bar of the District of Columbia Court of Appeals (the highest court in the District); he has not been suspended or disbarred in any jurisdiction or involved in any disciplinary proceedings; and he has never had his *pro hac vice* status denied or revoked by any court. A sworn affidavit to these facts is attached.

3. For the foregoing reasons, *amicus* IRLI respectfully requests that the Court grant this motion and enter an order admitting Mr. Canaan *pro hac vice* in this case.

4. In accordance with Local Rule 7.1(c), Plaintiffs and Defendants have both assented to the relief requested in this motion.

For the foregoing reasons, *amicus* IRLI respectfully requests that the Court grant this motion for admission *pro hac vice*.

Dated: February 4, 2025

Respectfully submitted,

JACOB M. RHODES
N.H. BAR No. 274590
Cleveland, Waters and Bass, P.A.
Two Capital Plaza, Fifth Floor
Concord, NH 03301
(603) 224-7761
rhodesj@cwbpa.com

CERTIFICATION OF SERVICE

I hereby certify that on February 4, 2025, the foregoing was served on all counsel of record via the Court's ECF system.

/s/ Jacob M. Rhodes
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Affidavit of Gabriel R. Canaan

I, Gabriel Canaan, hereby declare:

1. In accordance with Local Rule 83.2(b)(1)(A), I am an attorney at the Immigration Reform Law Institute. My office address is 25 Massachusetts Ave., NW, Ste. 335, Washington, D.C. 20001. My email address is gcanaan@irli.org, and my phone number is (202) 232-5590.
2. In accordance with Local Rule 83.2(b)(1)(B), I am admitted to practice in the following courts, along with the years of admission:
 - a. District of Columbia Court of Appeals, admitted June 20, 2024
3. In accordance with Local Rule 83.2(b)(1)(C), I am a member in good standing and eligible to practice in the above-listed court.
4. In accordance with Local Rule 83.2(b)(1)(D), I am not currently and have never been suspended or disbarred in any jurisdiction.

5. In accordance with Local Rule 83.2(b)(1)(E), I have not been denied admission to practice before any court; have not been disciplined by any court (and am not subject to any pending disciplinary matter); and have not been convicted of any felony or misdemeanor crime.

6. In accordance with Local Rule 83.2(b)(1)(F), I have not been denied admission to practice before any court, and no court has denied or revoked my *pro hac vice* status.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 4th day of February 2025.

s/ Gabriel Canaan
GABRIEL R. CANAAN
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Counsel for *Amicus Curiae*
Immigration Reform Law Institute